#### **DIVISION OF DISABILITY AND ELDER SERVICES**

BUREAU OF QUALITY ASSURANCE 1 WEST WILSON STREET P O BOX 2969 MADISON WI 53701-2969

> Telephone: 608-266-8481 FAX: 608-267-0352

FAX: 608-267-0352 TTY: 608-266-7376 dhfs.wisconsin.gov

# State of Wisconsin

Helene Nelson Secretary

Jim Doyle Governor

Department of Health and Family Services

**Date:** July 25, 2006 DDES-BQA 06-017

To: Adult Family Homes AFH 06

**From:** Kevin Coughlin, Chief

**Assisted Living Section** 

Via: Otis Woods, Director

Bureau of Quality Assurance

## **Standard Precautions Training in Adult Family Homes (AFHs)**

The purpose of this memo is to clarify the Standard Precaution training requirements for state-licensed Adult Family Homes (AFHs). Recently, Assisted Living Section staff have reported numerous inquiries from providers asking whether the Standard Precautions training required for AFHs must be a Department-approved Community-Based Residential Facility (CBRF) training program. The following information elaborates on the training requirements of Occupational Safety and Health Administration Standard 29 (OSHA Standard 29) referenced in Wis. Admin. Code § HFS 88.04(2)(h), and provides guidance to AFH providers about the required Standard Precaution training when a Department-approved CBRF course is not used.

### **Applicable Codes Related to Training:**

Wis. Admin. Code HFS 88.04(2)(h) states: "The licensee and all service providers involved in the operation of the adult family home shall comply with the universal precautions contained in the U.S. Occupational Safety and Health Administration Standard 29 CFR 1910.1030 for the control of blood-borne pathogens."

OSHA Standard 29, which addresses the control of bloodborne pathogens, is found at the following link:

 $http://www.osha.gov/pls/oshaweb/owadisp.show\_document?p\_table=STANDARDS\&p\_id=10051$ 

The Department expects AFHs to comply with all areas of OSHA Standard 29, except § 1910.1030(e), which applies to HIV and HBV research laboratories and production facilities. The OSHA Standard 29 training requirements are found at:

• 29 CFR §§ 1910.1030(g)(2)(i)-(iii), and (vii)(A)-(K)

# **Requirements:**

- 1. Section HFS 88.04(2)(h) requires AFHs to comply with OSHA Standard 29 related to the control of bloodborne pathogens. This OSHA Standard requires an employer to provide **annual training** in the prevention of bloodborne infections to all staff who may come in contact with the blood or other potentially infectious material from a resident.
- 2. AFH staff are not required to complete a CBRF Standard Precautions training course; however, AFH staff are required to receive Standard Precautions training from an entity knowledgeable in the area of standard precautions.
- 3. The following training programs meet the requirements of § HFS 88.04(2)(h):
  - All Department-approved CBRF training programs;
  - Training provided by a Department-recognized training entity (e.g., technical college, university, infection control practitioner, etc.);
  - Training provided by home health agencies, hospitals, nursing homes, and public health agencies, etc.;
  - Training provided by a qualified third-party trainer or consultant; and
  - Any training program that includes all of the required elements identified in OSHA Standard 29.
- 4. Documentation of training: Wis. Admin. Code § HFS 88.09(2)(a)8. requires AFHs to maintain records of successful completion of OSHA Standard 29 training.

NOTE: This memo addresses OSHA Standard 29 training requirements only. This memo does not address other OSHA requirements found in the federal regulation pertaining to bloodborne pathogens, and, therefore, does not relieve an AFH provider from complying with the other applicable OSHA Standard 29 requirements.

Please contact your Assisted Living Regional Director if you have any questions about this memo.

#### SB/SM/caa

cc: Laurie Arkens, BQA/PRQI Sherri Olson, BQA/PRQI Doug Englebert, BQA/PRQI Debra Bursinger, OLC Jesús Garza, OLC